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15 Attorneys for
16 FIRST SOLAR, INC.,
17 WILLOW SPRINGS SOLAR 3 LLC,
18 AND MOJAVE SOLAR, LLC

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case

No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER TO NEXTERA ENERGY'S
LIMITED OPPOSITION TO
MOTIONS FOR ENTRY OF A
PROTECTIVE ORDER**

Date: June 26, 2019

Time: 9:30 a.m. (PST)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019
4:00 p.m. (PST)

1 First Solar, Inc., Willow Springs Solar 3, LLC, and Mojave Solar LLC (collectively, the
2 “**Additional PPA Counterparties**”) hereby join (this “**Joinder**”) in the limited opposition of
3 NextEra Energy, Inc. and NextEra Energy Partners, L.P. (collectively, “**NextEra**”) [Docket No.
4 2617] (the “**NextEra Protective Order Objection**”) to the (a) *Motion of the Official Committee of*
5 *Tort Claimants for Entry of a Protective Order* [Docket No. 2419] (the “**TCC Motion**”) and (b)
6 *Motion for Entry of Protective Order Pursuant to Fed. R. Bankr. P. 7026 and 9014(c) and 11*
7 *U.S.C. § 105(a) Governing Discovery Materials and Other Information* [Docket No. 2459] (the
8 “**Debtor Motion**” and, together with the TCC Motion, the “**Motions**”).¹

9 For the reasons set forth in the NextEra Protective Order Objection, the Additional PPA
10 Counterparties respectfully request that the Court deny both Motions unless the ultimate protective
11 order includes provisions (i) permitting parties sharing a common interest to share Protected
12 Material with each other, and (ii) substantially similar to the Judicial Intervention procedures set
13 forth in Section 6.3 of the TCC Motion. Additionally, for the reasons set forth in the NextEra
14 Protective Order Objection, the Additional PPA Counterparties also request that non-transcribed
15 oral communications be excluded from the definition of “Discovery Material.”

16 NOTICE

17 Notice of this Joinder will be provided to (i) the Office of the U.S. Trustee for Region 17
18 (Attn: Anthony R. Vara, Esq. and Timothy Laffredi, Esq.); (ii) counsel to the Debtors; (iii) counsel
19 to the Creditors Committee; (iv) counsel to the Tort Claimants Committee; (v) the Securities and
20 Exchange Commission; (vi) the Internal Revenue Service; (vii) the Office of the California
21 Attorney General; (viii) the California Public Utilities Commission; (ix) the Nuclear Regulatory
22 Commission; (x) the Federal Energy Regulatory Commission; (xi) the Office of the United States
23 Attorney for the Northern District of California; (xii) counsel for the agent under the Debtors’
24 debtor-in-possession financing facility; (xiii) counsel to the PPA Counterparties; and (xiv) those
25 persons who have formally appeared in these chapter 11 cases and requested service pursuant to
26 Bankruptcy Rule 2002.

27 ¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to
28 them in the TCC Motion or Debtor Motion, as applicable.

1 The Additional PPA Counterparties respectfully submit that no further notice is required.

2 DATED: June 19, 2019

3 SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

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5 By: /s/ Amy S. Park

6 Amy S. Park
7 Attorneys for
8 FIRST SOLAR, INC.,
9 WILLOW SPRINGS SOLAR 3, LLC,
10 AND MOJAVE SOLAR LLC

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